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ADCPE Regulation No. 2 does contain specific numeric criteria for certain other toxics, in addition to PCP, but none of these toxics has ever been associated with site conditions or operations. The other constituents associated with the site are not found in affected water, and their low water solubilities give no reason to believe they could become a ground water threat. An MCL has not been established for PCP. In the absence of an MCL, the ARAR for discharge of both treated effluent and spring water to the Tributary is the EPA Ambient Water Quality Criterion for PCP, 1.01 mg/l.

#### 3.4.3 ARARs for Ground Water

The EPA's ground water protection strategy is based on the "differential protection" of ground water (i.e., ground water protection as it relates to a specific classification of an aquifer). Under the strategy, ground waters are classified as follows:

- o Class I - ground waters that are highly vulnerable and either an irreplaceable source of drinking water or ecologically vital;
- o Class II - ground waters currently used or potentially available for drinking water or other beneficial use; and
- o Class III - ground waters not a potential source of drinking water and of limited beneficial use.

For Class I and Class II ground water, Maximum Concentration Limits (MCLs) established under the Safe Drinking Water Act would be applicable for ground water sources which qualify as a public water system or a community water system. MCLs may also be relevant and appropriate to ground water that would not currently qualify as such systems but could potentially so qualify in the future. Similarly, where the State has established drinking water standards that are more stringent than the Federal MCLs, these may be applicable or relevant and appropriate.

No water wells in the vicinity of the Arkwood, Inc. site are currently impacted by affected ground water. The remedial alternatives described herein all provide monitoring to detect migration of affected ground water which would pose a potential threat to these wells. As presented in Section 3.3.2, the only constituent of concern in ground water is PCP. No MCL exists for PCP, and therefore the EPA's Ambient Water Quality Criterion of 1.01 mg/l is used in its place.

#### 3.4.4 ARARs for Air Emissions

Based on a review of all potentially applicable air emission-related regulations and standards, the only "legally applicable or relevant and appropriate requirement" for air emissions at the completion of remediation is specified in Section 2 of the Arkansas Plan of Implementation for Air Pollution Control. Section 2 provides that "Promulgation and enforcement of these Regulations of the Plan is intended to meet the requirements of the Clean Air Act (42 USCA § 1857, et seq.), as interpreted by the United States Environmental Protection Agency, including but not limited to attainment and maintenance of the National Ambient Air Quality Standards, ..."

To assure compliance with this standard, each of the proposed remedial alternatives contains provisions for periodic ambient monitoring to verify that site conditions existing at the completion of remediation are not causing or contributing to a condition of air pollution. All of the remedial alternatives are designed to ensure the emissions are in compliance with this ARAR.

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